

The Honorable John H. Chun  
The Honorable Michelle L. Peterson

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; and AMAZON.COM SERVICES LLC, a Delaware limited liability company,

## Plaintiffs,

V.

YAN LI, an individual; and XIWEI CHEN, an individual; and DOES 1-10,

## Defendants.

No. 2:23-cv-00486-JHC-MJP

**PLAINTIFFS' *EX PARTE* MOTION  
TO FILE OVER-LENGTH *EX PARTE*  
MOTION FOR ALTERNATIVE  
SERVICE**

WITHOUT ORAL ARGUMENT

**NOTE ON MOTION CALENDAR:  
MAY 22, 2024**

Pursuant to Local Civil Rule 7(f), Plaintiffs Amazon.com, Inc. and Amazon.com Services LLC (collectively, “Plaintiffs”) request that the Court permit them to file an over-length *ex parte* motion in support of their request for an order from this Court allowing for alternative service of process on Defendants. Local Civil Rule 7(e)(1) provides that motions brought pursuant to Local Civil Rule 7(d)(1), including *ex parte* motions, are limited to 2,100 words. By this request, Plaintiffs seek to file a motion containing approximately 1,900 additional words, for a total limit of 4,000 words.

Plaintiffs contend that the additional words are necessary to provide sufficient explanation of the facts surrounding Plaintiffs' investigation into Defendants' identities and whereabouts, as well as the law dictating the circumstances in which this Court may allow for

PLAINTIFFS' EX PARTE MOTION TO  
FILE OVER-LENGTH MOTION - 1  
(2:23-cv-00486-JHC-MJP)

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1 alternative service. This matter includes multiple Defendants, each of whom has gone to great  
2 lengths to conceal their identities and locations, thereby requiring diligent investigation by  
3 Plaintiffs. These investigations involved Plaintiffs, their counsel, and a private investigator, as  
4 well as searches of both public information and specialized databases, and early discovery. Thus,  
5 the 2,100 word limit is insufficient for Plaintiffs to provide this Court with the facts and  
6 authorities supporting the motion and to demonstrate Plaintiffs' need for an order allowing for  
7 alternative service of process on Defendants. For these reasons, Plaintiffs seek permission to file  
8 an over-length motion to provide this Court with the full detail necessary to support the order  
9 they seek.

10  
11 DATED this 22<sup>nd</sup> day of May, 2024.

12  
13 *I certify that this memorandum contains 243 words, in compliance with the Local Civil*  
14 *Rules.*

15 DAVIS WRIGHT TREMAINE LLP  
16 *Attorneys for Plaintiffs*

17 *s/ Scott Commerson*  
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24  
25  
26  
27 PLAINITFFS' EX PARTE MOTION TO  
FILE OVER-LENGTH MOTION - 2  
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